

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**UNITED STATES OF AMERICA
PLAINTIFF**

v.

**JOHNNY MANGUM,
DEFENDANT**

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CR NO. 2:04CR214-A

MOTION FOR MODIFICATION OF PRE-TRIAL RELEASE CONDITIONS

Comes now Defendant Johnny Mangum and moves the Court to modify the conditions of his pre-trial release in order to allow him to participate in the Earned Leave Program offered in the Middle District of Alabama and for cause states as follows:

1. Under present conditions of release, Defendant Mangum is restricted to work, church and visits with his attorney.
2. Defendant Mangum is in full compliance with the conditions of his release and has cooperated fully with the conditions of his release imposed upon him by his probation officer.
3. Defendant Mangum's motion has the full support of his Probation Officer, Mr. Bernard Ross.
4. The United States has no objection to the Court granting Defendant's Motion.

Wherefore the above matters considered, Defendant prays this Court grant his Motion and modify the conditions of his pre-trial release by allowing him to participate in the Earned Leave Program.

Respectfully submitted this day, July 15, 2005.

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Attorney for Defendant Linda P. Margulis

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CERTIFICATE OF SERVICE

This is to certify that the foregoing Motion for Modification of Pre-trial Release Conditions was served upon the following named individuals by mailing a copy of same to them by first class mail, postage prepaid, to their respective addresses of records on this day July 15, 2005:

Mr. Terry Moorer
AUSA
P.O. Box 197
Montgomery, AL 36101

Timothy C. Halstrom
Attorney for Defendant Mangum